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March 1, 2022

Via ECF

Hon. Valerie E. Caproni
United States District Judge
40 Foley Square
New York, New York 10007

Re: United States v. Bolivar Baez, 21 Cr. 637 (VEC)

Dear Judge Caproni:

I was appointed to represent Bolivar Baez in the above-referenced matter. I write without objection from the Government to request a modification to Mr. Baez's bail conditions.

By way of background, on August 19, 2021, Mr. Baez was arraigned on a complaint which charged him with a violation of 21 U.S.C. § 846. At his arraignment, Magistrate Judge Cave fixed Mr. Baez's bail principally in the amount of a \$50,000 PRB to be signed by two financially responsible persons, home detention (with permission to work) with electronic monitoring, travel restricted to the SDNY, EDNY and the District of New Jersey, surrender of travel documents and pretrial supervision. Thereafter, the Court modified Mr. Baez's bail conditions to allow him to spend Thanksgiving at the apartment of his mother, Christmas Day at the home of his fiancée's family, and to go to the gym between 5:00 p.m. to 7:00 p.m. each day. All conditions of bail have been satisfied and Mr. Baez has been compliant with all conditions.

Mr. Baez has secured an opportunity to work as a driver for Luimys Trucking LLC and for Lyft (see attached documents, copies of which have been provided to both of the Pretrial Officers noted below and to AUSA Kevin Mead). However, because Mr. Baez's would not be working in a stationary location, I have been advised by Pretrial Officer David Hernandez in New Jersey (who has direct monitoring of Mr. Baez because Mr. Baez resides in New Jersey) and by Jonathan Lettieri, Mr. Baez's Pretrial Officer in the SDNY (where this case is pending)

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that Mr. Baez's current bail conditions of home detention with electronic monitoring cannot accommodate employment where Mr. Baez would not be in a stationary location but would be driving around. For this reason, Mr. Baez seeks a modification of his bail to eliminate the condition of home detention with electronic monitoring.

I have discussed this application with Pretrial Officer Hernandez in New Jersey and with Pretrial Officer Lettieri in the SDNY. Neither officer objects to this bail modification and both have advised me that Mr. Baez has been in full compliance with the conditions of his bail. I also have communicated with AUSA Kevin Mead. He has advised me that the Government takes no position on this request.

Thank you for the Court's consideration of this bail modification request.

Respectfully submitted,

/s/

John F. Kaley

cc. AUSA Kevin Mead
Pretrial Services Officer Jonathan Lettieri
Pretrial Services Officer Hernandez
(all via email)

Application GRANTED. Mr. Bolivar Baez's bail conditions are modified to eliminate the condition of home detention with electronic monitoring.

SO ORDERED.



3/2/2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

Luimys trucking llc.

02/15/2022

Bolivar r baez contreras
Driver
Luimys trucking llc.
529 5th union city nj 07087
Luimystrucking@gmail.com
(201) 972-0445

Dear bolivar r baez contreras:

We are pleased to offer you employment at Luimys trucking llc. We feel that your skills and background will be valuable assets to our team.

Per our discussion, the position is driver, and your starting date will be 02/21/2022.

We look forward to welcome you as a new employee of luimys trucking llc.

Sincerely,

Betsy mejia
Company owner

A handwritten signature in black ink, appearing to read "Betsy Mejia", is written over a faint, light-colored circular stamp or watermark.

You're approved! Get first-ride
ready Inbox



Lyft Feb 10

to me ▾



CONGRATS, BOLIVAR

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let's make your first ride a smooth one.

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